

November 22, 2011

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 11-42 - Lifeline and Link Up Reform and Modernization
NOTICE OF EX PARTE PRESENTATION

Dear Ms. Dortch:

On November 21, 2011, Danielle Frappier, counsel to Nexus Communications, Steve Fenker, President, Nexus Communications (via telephone), Javier Rosado, Senior Vice President - Lifeline Services, TracFone Wireless, Inc. (via telephone), and undersigned counsel for TracFone met with Trent Harkrader, Chief Telecommunications Access Policy Division, Wireline Competition Bureau, Kimberly Scardino, Deputy Chief, Telecommunications Access Policy Division, and with Jonathan Lechter and Jamie Susskind, attorney-advisors, Telecommunications Access Policy Division.

During the meeting, we discussed the proposal submitted jointly by TracFone and Nexus on November 18 to create a data base for the identification of duplicate enrollment in the Lifeline program and for elimination of duplicate enrollments. That process would involve the participation of a third party vendor competent in the creation and maintenance of a data base, and would be funded by Eligible Telecommunications Carriers (ETCs) who provide Lifeline-supported services. We also discussed the development of a data base which would be used by ETCs to confirm whether applicants for Lifeline supported service are enrolled in qualifying programs. A program eligibility data base would also involve the cooperative efforts of ETCs and a third party vendor and would take longer to implement than would a duplicate enrollment data base.

We explained why the Commission should not impose short-term requirements on the Lifeline program which would unnecessarily complicate enrollment and reduce enrollment levels while the industry, the Commission and other stakeholders develop these data bases. Specifically, we described why requiring Lifeline applicants to produce documentation of their program-based eligibility (so-called "full certification") would preclude many qualified low-income consumers from completing the Lifeline enrollment process and noted that there is no record evidence that self-certification of program-based eligibility under penalty of perjury has resulted in significant numbers of unqualified persons receiving Lifeline benefits. In this regard, we provided data indicating that in states where ETCs have access to state data bases to verify customer enrollment in qualifying programs, most customers who self-certified their eligibility had their program participation confirmed by the state data bases. TracFone has produced similar data regarding its customers in Wisconsin and other states in prior submissions.

TracFone and Nexus indicated that they would continue to pursue this proposal and that it would provide additional details including a proposed timeline and milestones at the earliest practicable time.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. If there are questions, please communicate directly with undersigned counsel for TracFone.

Sincerely,



Mitchell F. Brecher

cc: Mr. Trent Harkrader
Ms. Kimberly Scardino
Mr. Jonathan Lechter
Ms. Jamie Susskind